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July 1, 2005

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Docket No. 05-015-1

Regulatory Analysis and Development

PPD, APHIS, Station 3C71

4700 River Road, Unit 118

Riverdale, MD 20737-1238

Re: Docket No. 05-015-1, National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards, Federal Register, Friday, May 6, 2005, p. 23962.

Dear Sir or Madam,

The following comments are being submitted on behalf of the Professional Dairy Heifer Growers Association [PDHGA] to the Animal Plant Health Inspection Service [APHIS] notice of availability and request for comments entitled *National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards* [Docket No. 05-015-1]. PDHGA, headquartered in Stratford, Iowa provides information, new technology and the exchange of management ideas that help every dairy producer, calf rancher and heifer grower provide the best care to each animal on their operation. We appreciate this opportunity to comment on this notice of availability and request for comments regarding the development and implementation of the National Animal Identification System [NAIS].

Having been represented on and informed of the recommendations formulated by the USAIP Cattle Species Working Group and Dairy Subgroup, PDHGA would like to go on record as supporting their recommendations. We would in particular like to stress support for the CWG decision to start the system with RFID ear tag technology. To adopt a technology neutral position will produce a fragmented national system. This will prevent all segments of the industry from being able to access the animal's ID and require multiple readers at all locations. It is just a bad idea and should not be implemented. We would also like to support moving the mandate for premise allocation up to January 1, 2007. PDHGA feels the NAIS Strategic Plan will enhance disease surveillance and monitoring through a local, state, national database structure that will enhance the veterinarian infrastructure.

PDHGA appreciates the opportunity to submit these comments to USDA/APHIS regarding this notice of availability and request for comments. If we can be of additional assistance, please contact us.

Sincerely,

Don Gardner, DVM

PDHGA Board of Directors, PDHGA Treasurer

JUL 19 2005

**"HEIFER GROWERS DEDICATED TO GROWING HIGH QUALITY DAIRY REPLACEMENTS"**